UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

DEPOSITION OF KEVIN ROCHEVILLE

Deposition taken at the LAW OFFICES OF

CULLENCOLLIMORE, P.L.L.C., 10 E. Pearl Street,

Nashua, New Hampshire, on Thursday, June 17, 2021,

commencing at 9:23 p.m.

A. Yes, Sir.

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- Q. Do you recall when Miss Bordeleau told you that?
 - A. I don't remember the exact dates.
 - Q. Did either Miss Goulden or Miss Bordeleau tell you why then Chief Goulden was fired from Brookline?
 - A. No, Sir.
 - Q. Do you have any other independent knowledge of why he was fired, if he was fired?
 - A. I do not.
 - Q. Okay. On page three, Paragraph 15, you state that on or before May 20th, 2014 Goulden began to have a sexual affair with your girlfriend, Cheryl Bordeleau. How much -- well, first of all, how do you know that to be true, if it's true?
 - A. My son, Aiden Rocheville. Mr. Goulden,
 Thomas Goulden, bought him baseball equipment. And
 he overheard his mother talking.
- Q. And what did he overhear his mother say, or what did he report to you?
- A. He basically told me his mother was dating
 Thomas Goulden. And that he had been to his ball

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     games.
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             Were you still together with Ms. Bordeleau
     at that time?
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         Α.
               Yes.
               Was she still living with you at that time?
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         Q.
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         Α.
              Yes.
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         Q.
              Did you confront Miss Bordeleau about that?
              Yes.
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         Α.
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              And what did she say?
         Q.
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         Α.
               That her private affairs were none of my
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     business.
              Can I assume you disagreed with that?
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         Q.
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         Α.
               I did disagree, yes.
               Is that what caused you and Miss Bordeleau
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         Q.
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     to split up?
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               I believe it had a large impact on our
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     relationship.
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               Other than the comment made by your son,
         Ο.
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     Aiden, did you have any other evidence that Ms.
20
     Bordeleau was having some sort of an affair or
21
     relationship with Mr. Goulden?
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              Yes, I did.
         Α.
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         Q.
              And what was that?
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- A. A good friend of mine, Buddy Wilkins, who lives in town, 19 Webster Avenue, witnessed Cheryl Bordeleau and Officer Tom Goulden multiple times, multiple locations in town while Officer Goulden was on duty in a Pelham Police Cruiser. They were parked side-by-side on Bridge Street and chatted for hours.
- Q. You attached to the interrogatories a couple of photographs of a police car next to a -- what appears to be a white SUV.

(Document handed to witness.)

- Q. And I'm showing you one of those that bears the caption below that says, This went on and on for months. Do you know who took that picture?
 - A. I did.

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- Q. And who is in the police car, if you know?
- A. Officer Thomas Goulden.
- Q. And whose white SUV is that in the background?
- 20 A. That's Cheryl Bordeleau's. It's a Toyota 21 Sequoia.
 - Q. And when was this picture taken?
- A. I don't know the exact date.

- Q. Relative to the date that's referenced in Paragraph 15 of the complaint, May 20th of 2014, was this picture taken before or after that?
 - A. Approximately the same time.
- Q. Did you ever speak to Thomas Goulden about your belief that he was having an affair with Ms.
- 7 Bordeleau?

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- A. Yes.
 - Q. And when was that?
- 10 A. At different times.
 - Q. How many times?
- 12 A. Three or four times.
- Q. And was it around the same time as this picture was taken?
- 15 A. Yes.
- 16 Q. What did you say to him?
- A. That I wanted to make my relationship with
 Cheryl work for the sake of the boys. He didn't
 seem to care, one way or the other.
 - Q. What did he say specifically?
- A. He basically told me to get away from him,
 not to have any contact with Cheryl. And it was in
 my best interest to stay away from Cheryl.

- Q. Was Cheryl still living with you at that time?
 - A. Yes.

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- Q. In the -- any other conversations that you had from -- sorry about that. Any other conversations you had with Mr. Goulden regarding Ms. Bordeleau? Do you remember him saying anything else to you?
- A. He basically told me he would take my life and turn it inside out and there wouldn't be nothing I could do about it.
- Q. And when you say he basically told you that, is that as close to a quote as you can get?
- A. He said he got rid of her boyfriend in the past.
- Q. Anything else you remember Mr. Goulden telling you with respect to his relationship with Ms. Bordeleau or with respect to you?
 - A. Told me to watch my back.
- Q. And this is all around the time that this photo was taken, which was around --
 - A. It went on for months.
- Q. Do you know where you get the date, May